

July 18, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141*

Dear Ms. Dortch,

On July 16, 2019, Karen Reidy of INCOMPAS and the undersigned, counsel to INCOMPAS, had a phone conversation with Randy Clarke of Commissioner Stark's Office with regard to the item on circulation in the above-referenced proceeding.

During the call, following up on an inquiry from Mr. Clarke, we discussed the fact that USTelecom withdrew its request for forbearance with regard to access to unbundled loops with the narrow exception of access to voice-grade analog copper loops. Accordingly, it withdrew its request for forbearance from unbundling requirements, inter alia, for digital copper loops (e.g., DS0s and integrated services digital network lines), two-wire and four-wire copper loops conditioned to transmit the digital signals needed to provide digital subscriber line services (generally referred to as xDSL-capable loops), line conditioning (needed in the provisioning of xDSL-capable loops),¹ DS1 and DS3 loops and subloops. Therefore, these unbundled network element rules will remain in effect pursuant to 47 U.S.C. § 251(c) and 47 CFR § 51.319.

Additionally, it is important to note that for those using a voice-grade analog loop as part of an enhanced extended loop (EEL), a minimum transition of three years is needed to coincide with the three-year transition period (or denial of forbearance) for the transport portion of the EEL.

¹ 47 CFR § 51.319(a)(1)(ii).

Marlene H. Dortch

July 18, 2019

Page 2 of 2

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata

Counsel to INCOMPAS

cc: Randy Clarke
Nirali Patel
Arielle Roth
Jamie Susskind
Travis Litman
Terri Natoli
Edward Krachmer
Michele Berlove